

The Honorable Tiffany M. Cartwright

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MARCUS JEROME DOUGLAS,  
Defendant.

NO. CR24-5043 TMC

AMENDED DISCOVERY PROTECTIVE  
ORDER

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by the United States of America and Defendant MARCUS JEROME DOUGLAS, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The following documents and materials may be deemed Protected Material. The United States will make available copies of the Protected Materials, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Materials is limited to the attorneys of record, and investigators, paralegals, law clerks, experts, and assistants for the attorneys of record (hereinafter collectively referred to as members of the defense team). This category of Protected Materials will be marked and labeled as "Protected Material":

- a. Interviews of victims;
- b. Personal identifying information concerning victims;

- 1 c. Records generated from Nisqually Youth Court, Indian Child Welfare, and  
 2 Washington State Department of Children, Youth, and Families; and  
 3 d. Grand jury materials.

4 2. Scope of Review of Protected Material

5 Defense attorneys of record and members of the defense team may display and review the  
 6 Protected Material with the Defendant. While the Defendant is in custody, the defense team may  
 7 provide him with Protected Material through the process established by BOP for providing such  
 8 material. The attorneys of record and members of the defense team acknowledge that providing  
 9 copies of the Protected Material to the Defendant and other persons is prohibited and agree not to  
 10 duplicate or provide copies of Protected Material to the Defendant and other persons.

11 3. Consent to Terms of Protective Order

12 The provisions of the protective order shall apply to all members of the defense team,  
 13 including but not limited to other attorneys, contract attorneys, investigators, legal assistants,  
 14 interns, experts, and paralegals. It is the responsibility of defense counsel to ensure that all  
 15 members of the defense team understand the restrictions of the protective order and understand  
 16 that they are required to abide by those restrictions.

17 4. Parties' Reciprocal Discovery Obligations

18 Nothing in this order should be construed as imposing any discovery obligations on the  
 19 government or the defendant that are different from those imposed by case law and Rule 16 of  
 20 the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

21 5. Filing of Protected Material

22 Any Protected Material that is filed with the Court in connection with pre-trial motions,  
 23 trial, sentencing, or other matter before this Court, shall be filed under seal and shall remain  
 24 sealed until otherwise ordered by this Court. This does not entitle either party to seal their filings  
 25 as a matter of course. The parties are required to comply in all respects to the relevant local and  
 26 federal rules of criminal procedure pertaining to the sealing of court documents.  
 27

6. Non-termination

The provisions of this Order shall not terminate at the conclusion of this prosecution.

DATED this 18th day of October, 2024.



HONORABLE TIFFANY M. CARTWRIGHT  
United States District Court Judge

Presented by:

/s/ Cecelia Gregson

CECELIA GREGSON

KRISTINE FOERSTER

Assistant United States Attorneys

/s/ Heather Carroll

HEATHER CARROLL

Assistant Federal Defender